

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

THE FEDERAL SAVINGS BANK,

Plaintiff,

v.

PAUL J. MANAFORT, KATHLEEN B.  
MANAFORT, SUMMERBREEZE, LLC,  
NEW YORK STATE DEPARTMENT OF  
TAXATION & FINANCE and "JOHN DOE  
1" through "JOHN DOE 10", the John Doe  
names being fictitious, said parties intended  
to be tenants or occupants, if any, having or  
claiming an interest in, or other entities  
having a lien upon, the premises described  
in the complaint,

Defendants.

Case No. 2:21-cv-01393-SJF-AYS

**NOTICE OF DEFENDANTS' FEDERAL RULE OF CIVIL PROCEDURE 12(B)(6)**  
**MOTION TO DISMISS PLAINTIFF'S COMPLAINT**

PLEASE TAKE NOTICE that for the reasons set forth in the accompanying Memorandum of Law, dated May 20, 2021, and upon the prior proceedings and pleadings filed in this Action, Defendants Paul J. Manafort, Kathleen B. Manafort, Summerbreeze, LLC will move this Court at the United States Courthouse for the Eastern District of New York, 100 Federal Plaza, Courtroom 830, Central Islip, New York 11722, for an Order dismissing Plaintiff's Complaint in its entirety with prejudice pursuant to Federal Rule of Civil Procedure 12(b)(6).

Date: May 20, 2021

Respectfully Submitted,

/s/ Rodney Perry

Rodney Perry (*pro hac vice*)

Matthew C. Crawl (*pro hac vice*)

RILEY SAFER HOLMES & CANCELILA LLP

70 W. Madison Street, Suite 2900

Chicago, Illinois 60602  
Phone: 312-471-8700  
Fax: 312-471-8701  
Email: [rperry@rshc-law.com](mailto:rperry@rshc-law.com)  
[mcrowl@rshc-law.com](mailto:mcrowl@rshc-law.com)

Nafiz Cekirge  
Brittney L. Denley  
RILEY SAFER HOLMES & CANCELLO LLP  
136 Madison Avenue, 6th Floor  
New York, New York 10016  
Phone: 212-660-1000  
Fax: 212-660-1001  
Email: [ncekirge@rshc-law.com](mailto:ncekirge@rshc-law.com)  
[bdenley@rshc-law.com](mailto:bdenley@rshc-law.com)

*Attorneys for Defendants Paul J. Manafort,  
Kathleen B. Manafort, & Summerbreeze  
LLC.*